

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION

: Master File No. 12-md-02311
: Honorable Marianne O. Battani

In Re: All Auto Parts Cases

: 2:12-md-02311-MOB-MKM

THIS DOCUMENT RELATES TO:

All Dealership Actions

**DEALERHIP PLAINTIFFS' EX PARTE MOTION FOR LEAVE
TO FILE A REPLY MEMORANDUM NOT TO EXCEED 36 PAGES
IN FURTHER SUPPORT OF THEIR MOTION FOR PROTECTIVE ORDER**

Pursuant to Local Rule 7.1(a)(3), Dealership Plaintiffs submit this *Ex Parte* Motion for Leave to File a Reply Memorandum Not to Exceed 36 Pages in Further Support of Their Motion for Protective Order as to Dealership Plaintiffs' Depositions. Dealership Plaintiffs seek leave to file a reply memorandum of up to 36 pages (in 12 point font).

In support of their motion for leave to file a reply memorandum not to exceed 36 pages, Dealership Plaintiffs state as follows:

1. Local Rule 7.1(d)(3) provides for a 7-page limit for reply briefs. Judge Battani's Practice Guidelines provide for a 5-page limit when 12 point font is used.
2. Dealership Plaintiffs' Reply Memorandum provides responses to arguments made in Defendants in their 44-page Opposition Memorandum, which covers thirteen topics, numerous sub-topics and certain new issues. Extra pages sought are necessary for Dealership Plaintiffs to fully and accurately respond to Defendants' various arguments.
3. Dealership Plaintiffs attempted to limit the pages of their memorandum without sacrificing clarity and/or its ability to address the factual and legal issue in Defendants' brief. Dealership Plaintiffs need 36 pages in order to cogently address Defendants' arguments.
5. The Court and the Master have shown a willingness to extend page length when necessary to fully address the relevant issues.
6. The Court has previously permitted Defendants to file reply briefs that were 35 pages in length, in support of their motions to dismiss.
7. Due to the extreme importance of the issues, as well as the rights and burdens at play, Plaintiffs believe that it is imperative that they be permitted to fully set forth their position to the Master.

For the reasons set forth above, Dealership Plaintiffs respectfully request that the Master enter an Order granting Dealership Plaintiffs' *Ex Parte* Motion for Leave to File a Reply Memorandum Not to Exceed 36 Pages.

Date: December 23, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2015 I electronically filed the foregoing papers with the Clerk of the Court using the ECF system which will send electronic notices of same to all counsel of record.

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